



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/LHE/SME
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 21, 2017

By ECF and Email

William A. Burck, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
777 6th Street NW, 11th Floor
Washington, D.C. 20001

Michael S. Sommer, Esq.
Wilson Sonsini Goodrich & Rosati P.C.
1301 Avenue of the Americas, 40th Floor
New York, New York 10019

Gregory J. O'Connell, Esq.
De Feis O'Connell & Rose, P.C.
500 Fifth Avenue, Suite 2630
New York, New York 10110

Kevin J. O'Brien, Esq.
Ford O'Brien LLP
575 Fifth Avenue, 17th Floor
New York, New York 10017

Jonathan S. Sack, Esq.
Morvillo, Abramowitz, Grand, Iason &
Silberberg P.C.
565 Fifth Avenue
New York, New York 10017

Seth L. Levine, Esq.
Levine Lee LLP
650 Fifth Avenue, 13th Floor
New York, New York 10019

Michael D. Mann, Esq.
Sidley Austin LLP
787 Seventh Avenue
New York, New York 10019

Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017 and July 27, 2017. The government again requests reciprocal discovery from the defendants.

Defense Counsel
August 21, 2017
Page 2

The government has made available at First Choice Copy (“First Choice”), for reproduction to the defendants, the following:

- Electronic copies of hard copy materials that were recovered through the search executed at the offices of Platinum Partners on June 22, 2016, and were seized from the locations described below:
 - A cubicle across a hallway from the office of Gregg Donnenfeld:
EDNY-PP-HC-0106776 – EDNY-PP-HC-0110917;
 - A leased office diagonally across from the office of Murray Huberfeld and David Bodner:
EDNY-PP-HC-0110918 – EDNY-PP-HC-0112919;
 - A box labeled “Itchy Bodner” located inside of a closet:
EDNY-PP-HC-0112920 – EDNY-PP-HC-0114798; and
 - The office of Andrew Kaplan (note that these materials supplement the materials previously produced to you in discovery by letter dated May 5, 2017):
EDNY-PP-HC-0114799 – EDNY-PP-HC-0114893.
- Electronic copies of emails and other documents, including but not limited to bank records, produced by B Asset Manager LP:¹
B000000001 – B000762687 and
AN-EDNY-0000001 – AN-EDNY-0001631;
- Electronic copies of emails, messages and other documents, produced by an individual formerly associated with B Asset Manager LP:
000001 – 31140 (note that the prefix for this Bates range is the individual’s initials); and

¹ Certain of the documents contained in this production from B Asset Manager LP duplicate documents and bank records previously produced to you by the government in discovery in this case, including by letters dated April 3, 2017 and May 11, 2017.

Defense Counsel

August 21, 2017

Page 3

- An electronic copy of the contents of a laptop containing documents, produced by BDO USA, LLP:
BDO-PLAT-DOJ-0000000001 – BDO-PLAT-DOJ-00063610.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney
Eastern District of New York

By: /s/
Alicyn L. Cooley
Lauren H. Elbert
Sarah M. Evans
Assistant U.S. Attorneys
(718) 254-6389 (Cooley)

cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)